

GOLDBERG, STINNETT, DAVIS & LINCHEY
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Attorneys for Appellant, Jeffrey E. Hoffman

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JEFFREY E. HOFFMAN,

Plaintiff,

vs.

THOMAS R. LLOYD, an individual,
EDWARD L. BLUM, an individual, and
DOES 1 through 20, inclusive,,

Defendants.

No. 3:07-CV-2417 MHP

THOMAS LLOYD,

Cross-Plaintiff,

vs.

JEFFREY E. HOFFMAN, dba H&B
PROPERTIES; H&B PROPERTIES, LLC;
J. EDWARDS INVESTMENT GROUP,
INC., and NORCAL FINANCIAL, INC.,

Cross-Defendants.

Date: September 24, 2007
Time: 2:00 p.m.
Place: Courtroom 15
18th Floor
450 Golden Gate Ave.
San Francisco, CA 94102
Judge: The Hon. Marilyn Hall Patel

**EXHIBITS "A" AND "B" TO DECLARATION
OF DENNIS D. DAVIS RELATING TO APPEAL BRIEF**

DATED: August 24, 2007

GOLDBERG, STINNETT, DAVIS & LINCHEY
A Professional Corporation

By: /s/ Dennis D. Davis
Attorneys for Jeffrey E. Hoffman

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June 27, 2007

BY FAX (415) 438-9819

Donald F. Drummond, Esq.
Drummond & Associates
One California Street, Suite 300
San Francisco, CA 94111

Re: Thomas R. Lloyd, Debtor, Case No. C-06-2416 MHP
Jeffrey E. Hoffman v. Thomas R. Lloyd and Edward L. Blum, APN 05-3328

Dear Mr. Drummond:

We are in receipt of your two short recent letters. I called and left a message but have not heard back from you. With respect to the homeowners insurance, please provide evidence that Mr. Lloyd has perfected the insurance by making payments. He is required to report this information on a monthly basis to the Court in any event, so that it is hardly a secret.

I do not know what you are referring to about holding my client in contempt of the February 27, 2007 order. Presumably, you are referring to Mr. Goodrich's incorrect statement in the application to retain your office that the police identified the individuals referred to as agents of Mr. Hoffman. In fact, there is not such reference. The papers that have been filed thus far appear not to shy away from exaggeration. For example, one "fact" contained in a declaration from your office is that Mr. Goodrich had ordered a copy of the transcript of the District Court hearing before leaving on vacation. In fact, he did not do that and I was the one who actually ordered that transcript, because of his failure to do so. Had you contacted us before making that representation, the error would have been avoided.

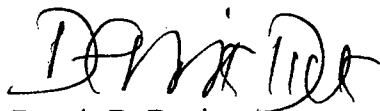
With respect to Judge Patel's Order, even though it was obtained *ex parte* based upon a distortion of the facts presented by Mr. Lloyd, our client will simply pay the expense referred to in Paragraph 4, because the cost of seeking a hearing to present the true facts exceeds the cost of changing locks. Hopefully, Mr. Lloyd will not escalate this matter by exaggerating matters. His description varies quite dramatically from what was described by the police report. As I understand it, a locksmith has already removed the lock, so I am not sure why there is delay in providing the locksmith bill. If you contend there was any other damage, please provide evidence of that and we will respond promptly.

Donald F. Drummond, Esq.
June 27, 2007
Page 2

Very truly yours,

GOLDBERG, STINNETT, MEYERS & DAVIS
A Professional Corporation

By


Dennis D. Davis

DDD:paj

cc: Anne Hayes, Esq.

10329

Entered on Docket

August 03, 2007

GLORIA L. FRANKLIN, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA1 GOLDBERG, STINNETT, DAVIS & LINCHEY
A Professional Corporation

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5 Attorneys for Jeffrey E. Hoffman, H&B
Properties LLC, J. Edwards Investment
6 Group, Inc. and Norcal Financial, Inc.

Signed and Filed: August 03, 2007

THOMAS E. CARLSON
U.S. Bankruptcy Judge

7
8 IN THE UNITED STATES BANKRUPTCY COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

12 In re:

13 THOMAS LLOYD,

15 Debtor.

Case No. 04-32921-TEC

Chapter 11

17 **ORDER AUTHORIZING PRODUCTION OF**
18 **DOCUMENTS AND APPEARANCE TO GIVE**
TESTIMONY PURSUANT TO BANKRUPTCY RULE 2004

19 Upon the application of Jeffrey E. Hoffman, H&B Properties LLC, J. Edwards Investment Group,
20 Inc. and Norcal Financial, Inc., for an order directing Thomas Lloyd to produce documents for inspection
21 and photocopying and to appear and give testimony pursuant to the provisions of Rule 2004 of the Federal
22 rules of Bankruptcy Procedure, and good cause appearing therefore,

23 **IT IS HEREBY ORDERED** that Thomas Lloyd shall produce the following documents at the law
24 offices of Goldberg, Stinnett, Davis & Linchey, A Professional Corporation, 44 Montgomery Street, Suite
25 2900, San Francisco, CA 94104 on August 21, 2007 at 10:00am:

26 1. All post-petition banking records and any other records reflecting expenditures of funds post-
27 petition;

28 2. All records reflecting payment of insurance premiums on the Elisabeth Street Property during

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EXHIBIT "B"

1 the year 2007;

2 3. A copy of all policies of insurance in effect relating to the Elisabeth Street Property.

3 4. All evidence of any repairs or other maintenance to the Elisabeth Street Property during the
4 year 2007.

5 **IT IS HEREBY FURTHER ORDERED** that Thomas Lloyd shall appear at the law offices of
6 Goldberg, Stinnett, Davis & Linchey, A Professional Corporation, 44 Montgomery Street, Suite 2900, San
7 Francisco, CA 94104, on August 21, 2007, at 10:00 am for an examination under oath pursuant to the
8 provisions of Rule 2004 of the Federal Rules of Bankruptcy Procedure.

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10 ****END OF ORDER****
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COURT SERVICE LIST

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44 Montgomery Street, Suite 2900
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Office of the U.S. Trustee
235 Pine Street, Suite 700
San Francisco, CA 94104-3401